



AHENSIAŊ PRUTEKSION LINA'LA GUÁHAN

LOURDES A. LEON GUERRERO, GOVERNOR OF GUAM • JOSHUA F. TENORIO, LIEUTENANT GOVERNOR OF GUAM
WALTER S. LEON GUERRERO, ADMINISTRATOR

Guam Environmental Protection Agency
Board of Directors Meeting
Thursday, March 14, 2019 @ 4:00 pm
Main Office Conference Room

Agenda

- I. Call to Order
- II. Approval of Agenda
- III. Approval of December 11, 2018 Minutes
- IV. Administrator's Report
- V. Old Business
 - Navy NOV Status
 - Nova Group, Inc. Settlement Agreement Status
 - Safe Drinking Water NOV – GWA Status
 - RRF Rules and Regulations Draft Update
 - Guam Water Quality Standards Triennial Review
- VI. New Business
 - CH2M/JACOBS Update (PIEC)
 - Walter S. Leon Guerrero – Appointment as Administrator, Guam EPA
 - Air Force Re Stipulated Request for Continuance-NOV #2019-001
- VII. Miscellaneous
- VIII. Next Meeting Date/Adjournment



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THE GUAM ENVIRONMENTAL PROTECTION AGENCY BOARD OF DIRECTORS

Effective January 7, 2019, the Guam Environmental Protection Agency (Guam EPA) Board of Directors appoints and confirms Mr. Walter S. Leon Guerrero as the Administrator for the Guam EPA, to administer all activities of the Agency, pursuant to Title 10 of the Guam Code Annotated, Chapter 45 §45104.

Further, the Guam EPA Board of Directors moves to approve a pay amendment for the Administrator, in accordance with 2014 Government of Guam Competitive Wage Act Executive Pay Plan, from ES1 to ES5, effective to January 9, 2019, as reflected in the official release of the executive staffing pattern.

Confirmed this day: March 14, 2019

Mr. Robert Perron,
Guam EPA Board Chairman

As witnesses this day by:

Ms. Vilma M. Balajadia
Guam EPA Board Secretary



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**Guam Environmental Protection Agency
Board of Director's Meeting
Thursday, March 14, 2019 @ 4:00 p.m.
Main Office Conference Room**

MINUTES

- I. Call to Order:** Chairman Robert Perron called the Board of Director's meeting to order at 4:08 p.m. The following individuals were present at the board meeting:
Board Members: Robert Perron, Chairman, Terrence Brooks, Vice Chairman, Steve Hollister, Ann Roth and Florida Sanchez. (Steven Carrara, not present).
Guam EPA Staff: Walter S. Leon Guerrero, Administrator; Kristan Finney; Brian Bearden; Conchita SN Taitano; Sabrina Cruz-Sablan; Jesse T. Cruz; Magdalena Castro; Nicolas Rupley Lee; Margaret P. Aguilar; Glenn San Nicolas; and Vilma Balajadia. Guests: Larry Gast, General Manager, GSWA; Arlene Acfalle; and Cyrus Luhr, Representative from Senator Perez's office.
- II. Approval of Agenda:** The Vice Chairman made a motion to approve the agenda, seconded by Director Hollister. All voted in favor and the motion passed.
- III. Approval of Minutes:** The Vice Chairman made a motion to approve the minutes, seconded by Director Roth. All voted in favor and the motion passed.
- IV. Administrator's Report:** The Administrator provided a status of the Board of Directors pending confirmations for the following: *Flori Sanchez's* confirmation packet has been forwarded to the Legislature per legal council at the governor's office (Rec'd on March 12, 2019 by the Legislature); The Administrator stated that "there is also an additional gentleman who is an engineer that they sent down –I just spoke to him today."; and that Bob Perron's packet is still in the works "as well as anybody else, which is Bill Nault, and so if we get that then we'll be close to our ten." The Administrator stressed to the governor's office "all our Notice of Violations (NOVs) can be shot down if we don't have a quorum." The Administrator was adamant to the governor's office stating that every seat on the Guam EPA Board must be filled to prevent any issues that may arise from not having a quorum.

Administrator: We've had two bills (Bill 25-35 and Bill 27-35) that came up this past week that Nic spoke on behalf of me –one was Senator Therese Terlaje's Bill 27-35 relative to the timely publication of all NOVs, Orders of Compliance, Notices of Defense, Voluntary Compliance Agreements, Settlement Agreements, and Referrals to the Office of the Attorney General for Prosecution [publish all aforementioned issued to any agency or persons in violation of any of the acts on our website *no later than* fifteen (15) days from service] by GEPA; and to require that all of the above be reported to the GEPA Board of Directors [at the next scheduled regular board meeting]. (Bill 27-45 passed unanimously on March 21, 2019 by the Legislature). The Administrator stated this measure was about being transparent and that the agency is in full support of the measure. The Agency has decided to start posting on the website the information required in the proposed measure beginning "this calendar year." The Administrator stated that the Agency currently has one (1) NOV that has been processed; and pending an appeal by an unnamed couple and/or the outcome of the appeal, then, "we'll upload the others into our website just like we promised we would." Director Roth: She was asking for more than NOV's wasn't she? She was asking for settlements?

Mr. Lee provided a brief history of how Bill 27-35 became a measure beginning in the 34th Guam Legislature with Bill 372-34. Mr. Lee explained, "There was some concern from one of the senators at the hearing that the senator compared this measure to the police blotter –you see people getting arrested on these charges but the media never really covers what happens to them if they are found innocent or guilty or whatever –so this senator's concern was that he didn't want somebody's name being dragged through the mud because we didn't report on the finality of the case –so we did two things –we agreed to do that so she's looking at settlement agreements and voluntary compliance agreements and the disposition of the case but we did mention to the senator that we can't control what Joe or Jane Cruz will do with that information once they get it from us and we can't control what the media is going to do with that information as well because the law being what it is –we just have to furnish the information –so this is more of an ease of access."

Mr. Lee expressed his concerns with the proposed measure (Bill 27-35) and how the Agency would be responding to Freedom of Information Act (FOIA) inquiries. Mr. Lee referred to the current GEPA website. He wanted to discuss website formatting and reporting and its compliance to Bill 27-35. Vice Chairman Brooks requested of Mr. Lee to "prepare for us a sample form that you would like for us to review." Mr. Lee accepted and committed to presenting to the Board "on the next meeting." The Administrator stated that he wants GEPA to be "fully engaged in doing this".

Administrator: "So the other bill is Senator Telo's bill (Bill 25-35) on used oil low sulfur and that bill, though the intent is good, it's not really applicable for right now because...if that bill were to come into law we would have tons of used oil and nowhere to go and except for maybe selling it off island which would cost triple or I don't even know what the economic numbers are?" Chairman Perron asked, "Your talking \$10 a gallon?" The Administrator stated that the proposed measure is "unfeasible"; and while the Agency supported the idea, it did "not" support "the bill itself". The Administrator "will work with her (Senator Telo) to try to amend it to where it is beneficial for Guam versus quite the contrary to the way it is written now." The Administrator stated that, "GPA, Us, PUC all had similar stance," and expressed the need to dispose of "used oil" in an "economically feasible fashion that's also good for us and the environment."

The Administrator transitioned to one of his immediate goals: "*to get Guam EPA a building and a permanent home that is ours.*" –The Administrator stated he is working with *Jesse* (Cruz), *Brian* (Bearden), *Conchita* (Taitano), *Nick* (Lee) and *Connie* (Afilleje) and all the other division heads to start up our building committee again –to start throwing around ideas.

The Administrator appointed Brian Bearden as the head of the Building Committee. He further stated that he has engaged USDA and GHURA to assist in finding "financial opportunities either through grants or other money" to build the Building. The Administrator proposed to the front office to also "engaged Department of Interior." The Administrator stated that USEPA "is in total support" and will allow us to "use our budget" but "if we could find additional money that will help us keep our overhead and our operations intact and not have us to skinny down some of the things that we do." The Administrator is trying to work with *Joe Borja* at Department of Land Management to get the property so that we can move forward. He also stated that "USDA has provided money for other government agencies and I've directly engaged with *Joe Diego* who is the head of USDA here and we are going to have some meetings set up..." The Administrator requested any help from those in attendance to find other avenues to assist in achieving our goals. He said, "we are looking for a three (3) to five (5) acre parcel that will house not only enough for the staff but our lab as well as our vehicles which includes our two (2) boats so we do need a lot of space.

The Administrator transitioned to the Agency Budget.

Administrator: "If you look at our financial statement we are in the hole as far as our consolidated grant goes and that's to be expected –we had budgeted for four (4) months into this fiscal year –which would put us in January and we never got our 2019 budget. Now, U.S. Congress did pass the budget (and) money is slowly coming in from headquarters to the region...we are expecting a Three Million Dollar (\$3M) Grant Award this is year—one (1) of our five (5) year fiscal cycles. So that being said, any money that we *do not* expend this year *does not* go back to the federal government; it rolls over for our five (5) year fiscal cycle, which would put us in a good position. We won't have to spend all Three Million Dollars (\$3M) off the bat which is a really, really good thing because by the time we get it we might only have like five (5) months to six (6) months to actually spend it..."

"If we were to get the money at the end of this month, we'll probably be about Six-Hundred Thousand (\$600K) in the hole, but with the Three Million Dollars (\$3M), we could immediately pay that back and then start running in the black like we should be. So technically, we are in the hole; and it's because we didn't get our grant award yet. Any Questions?" Chairman Perron: "The General Fund is advancing the money?" Administrator: "We are actually borrowing from our special accounts and our other federal and local accounts at this point so we have not had to borrow from the General Fund and it doesn't look like we will need to...any other questions on the budget?" Director Hollister: "If we don't use the left over money, will it go against us?" Administrator: "No." Director Hollister: "In the future?" Administrator: "No, because we are in a five (5) year fiscal cycle. We can roll it each year you know no pause—we can use it—it's at the end of the 5th year fiscal cycle that if we don't use it (then) there's the likelihood that we have to give it back its theirs and then that's where we would get punished more for. I know what your asking if they allocated it for the year and if we didn't use it—they kind of understand the situation and again for this fiscal cycle we are in March...we have not received our grant award, so if they expect us to spend the Three Million dollars (\$3M) in six (6) months so that we don't get punished—its kind of a—they have enough understanding to know that's not something that they would go after us on and *Carl* (Goldstein) would fight for us on that."

The Administrator stated that he has met with three (3) senators separately including the Speaker. The Administrator invited the Board members to attend meetings with the senators and offered the schedule. Chairman Perron asked if the Speaker talked about the bottle bill and the Administrator stated that she briefly did but the bottle bill discussion is "going to be our next meeting." Director Roth requested the Administrator send out the schedule of meetings with senators to the Board of Directors.

The Administrator transitioned to discussions on National Oceanic and Atmospheric Administration (NOAA) having ten (10) GEPA members at a NOAA sponsored Science Oil Spills and Scat Training. Jesse Cruz: Mr. Cruz stated that the training, which is a first in the past twelve (12) years, is going really well with participants from the Coast Guard, GEPA, Port Authority of Guam, Bureau of Statistics and Planning.

V. Old Business:

- *Navy NOV – Notice to Appeal*

Kristan Finney: "That one actually—I've been in touch with their legal counsel we are still working some stuff out but we have been in touch and so we should have something."

- *Nova Group, Inc. – Settlement Agreement Status.*

Chairman: "The settlement has that been fully accomplished?" Ms. Finney: "yeah, except for the SEP portion—that's still pending—They are either going to have to propose something pretty soon here or that will convert to cash." Chairman: "They've already paid the cash portion though?" (Administrator and Ms. Finney both replied, "Yes.") Administrator: "So we got the checks, for what is it? Mrs. Conchita Taitano: "\$90,000?... Yes, \$70,000 and \$10,000...\$80,000." Administrator: "\$70,000 going to Hazardous Waste and \$10,000 going to Solid Waste; and then the SEP would be just something related to Solid and Hazardous Waste...otherwise, like Kristan said, it would get converted and we'll split it up between the Hazardous and Solid Waste Program."

- *Safe Drinking Water NOV/ Guam Waterworks Authority (GWA).*

Administrator: "We rectified most of the issues on that NOV as being—things that administratively we've met with them myself and *Brian* (Bearden - Chief Engineer) and part of his team met with *Miguel Bordallo*, GWA General Manager, *Mr. Paul Kemp*, Asst. General Manager and other members of their team and made it quite clear that this is very simple administrative guidelines that they need to meet and follow; and if they do, than there is no penalty, no issues about it—they need to provide us some SOP's. *Brian Bearden*: "They need an SOP that they need to turn into us so they can formalize the process they take when they suspect that it's a dirty faucet at a house. Because that's what it turned out to be—a dirty faucet. They just need to set this up. We've talked to them about this before an SOP for how they handle those situations in the future; so, that they don't have a violation which they had this time by failing to take a required number of samples." Administrator: "Not wanting to detract from GWA and their ultimate mission, because it's their distribution line that this sampling is for. Some of the issues that have come living in an island: you've got bugs, and bugs like to find little damp holes, and so some of the faucet's sample locations—mud daubers crawl in there (and) build their home like any other holed concrete wall hole or anything and those would give false positive for the system because you'll have mud coming out."

So, we're trying to get GWA to come up with the SOP that this isn't a red flag for them in the future for their distribution." Brian Bearden: "and also making sure that we are not missing a real violations—we take these very serious—in this case it was just a contaminated faucet or sampling." Chairman Perron: "Ann (Roth) did you have any questions? I know you had some concerns about the NOV's and where they were standing." Director Roth: "Until they're settled, I'd say keep them on there—that's all I'm saying until we know that they are actually settled then it has to be addressed."

- *RRF Rules and Regulations Draft – Update*

Sabrina Sablan: "Yesterday I sent you (the Board) a copy of the final draft—well our version of the final draft—I just wanted to see if you had any questions on that—we did have the public hearing in December 2018 and this is the first board meeting that we've had since then—during the public hearing we only had one person that came as the public which was our Board Chairman who came in as the Recycler and he did have one question during the public hearing and that was about the stimulus portion of how we arrived at the figure for the shipping cost and I did talk to the contractor and it is addressed in the rules as we mentioned during the public hearing they were using the world freight rates and so there is an option and that goes in and gives you the local port and then the destinations—the Asian destinations and that's how they arrived at that figure—so that was basically the only question that we had during the public hearing—it was properly noticed—no one came to pick up any documents or no other comments were made during that period."

Mrs. Conchita Taitano requested that the Board approve the recommendations in the final draft version. Director Roth questioned the prioritization of use of funds. Mrs. Taitano responded with, "No, it gives the Administrator the authority to prioritize. We have things listed there but that doesn't mean that that's the order that he or she may choose." Director Roth suggested changes to the wording because "when you say first priority it implies that that's the most important." Mrs. Sabrina Sablan clarified that "the reason why we list it as that is because that's what it says in the law—we are just copying the law—we are just repeating what the law says. Mrs. Taitano further clarified, "Chapter 51 Article 3—so when in Article 3—the law specifies there is a first, second and third priority and the third one says the administrator will decide what to prioritize and I'm sorry—I misunderstood your question—so that's right—so all they did was cite what was in the statute."

Director Roth asked, "does the law imply that the first priority is the most important and you must take care of all of this...before Funds are allocated?" Mrs. Taitano replied, "That's Correct. Yes that is, it is very specific—first priority is listed." Director Roth expressed concerns that funding for recycling may never be realized "until you get rid of all the junk vehicles, batteries, waste oil, white goods and appliances, cardboard." Mrs. Taitano stated, "If we are generating close to between 2.7 and 2.9 million annually (from the collection of fees which is part of the \$25 vehicle registration fee)...there is quite a bit that is not used in its entirety—which everyone has alluded to which everyone wants to raid."

Director Roth expressed her concerns about funding for the "third priority—recycling." Vice Chairman Brooks provided input stating, "if they do have the money they can use it; if they don't have the money, then they won't." Director Roth stated that "the Administrator has to focus on the first priority." Mrs. Taitano acknowledged "room for amendments" and her continuing discussions with Senator Perez's office, but strongly expressed the need to get the regulations in place.

Director Roth made a "move to approve the regulations." However, Chairman Perron wanted to discuss "the tires and the abandoned vehicles." He talked about a need for tire and vehicle identification of the owners because some tire shops say the Revolving Recycling Fund (RRF) "is supposed to take care of all the waste tires so we should be giving these to the government because the RRF is taking care of waste tires according to the law in the priority—but really it's only tires that are non-point specific that you don't know who owned that tire—it's in the jungle or it's not identifiable as to who's tire it is...if you know who's tire it is than they got to take care of it, not the RRF, at least that's the way I see it." Mrs. Taitano recommended that the issues with collection of disposal fees and the purpose of the RRF be addressed in the statute.

However, Attorney Finney said that "this is where you would pursue" any prohibitions—in Regulations. Mrs. Taitano agreed. The Administrator recommended that "if you guys want to add verbiage which would require us to amend some things—I would request that you guys have—I don't know how we could do this even if we have a special meeting between now and next month." Vice Chairman Brooks asked, "how about we could put this in

place now and then we could have another public hearing and let's get everything that needs to be amended put together?" Cyrus Luhr from Senator Perez's office confirmed that Senator Perez would be willing to hold a public hearing.

Chairman Perron said, "We need to be able to obligate these funds –if we know it's going to continue to be robbed by everybody as a need so I agree with Terry (the Vice Chairman). Attorney Finney provided comments to the draft final version, "it's specifically for these later sections starting with 24303.4 and then .5 and .7 and .9 haven't been incorporated into this draft yet –so I just wanted to say that and the other thing I guess I didn't realize you guys were going to be voting on these today because you don't have a complete record I mean like –I don't know if like when you guys provided your rules like in the past when you voted on –if you have everything like with the transcript..." Mrs. Sablan stated that if the Board decides to move forward and approves the final draft, "a whole complete record of everything the statute requires, everything from transcripts to electronic copies on a c.d. however many you want its available –its just up to you if you want to move forward with this now."

Director Roth asked, "What does 'reserve' mean? Under the zero waste and green waste?" Vice Chairman Brooks responded, "Its like a section that was there previously or they took it out –they are reserving it for future changes. Mrs. Sablan added, "It's a section that we still want to move forward with." Director Roth asked, "So you just want approval 'as is'?" Vice Chairman responded, "...we can't approve something that's not in front of us." Mrs. Taitano concluded with, "you know Ann, we've been working on this for over 2 years. We are trying to beat OPA from writing to us again and asking for the fourth time maybe."

Approval of the Rules and Regulations for the Recycling and Revolving Fund: Director Roth made a motion to approve the Rules and Regulations for the Recycling and Revolving Fund, seconded by the Vice Chairman. All voted in favor and the motion passed.

Director Roth: "I just want to discuss that she (Kristan Finney) said that she had some concerns on the RRF that she wants to have them incorporated and that she's met with *Conchita*." Attorney Finney responded, "well actually no, I've talked to *Sabrina*." Director Roth asked if Attorney Finney was "okay with her integrating them?" Mrs. Sabrina Sablan interjected, "well the AG is going to be able to have another opportunity because we are going to have to send this to them they will be able to provide their comments." Attorney Finney stated that her comments which was previously submitted to *Sabrina*, are "not incorporated" into the draft Regulations; and that "these sections are going to need to comply with your statutory authority –cause that's one of the things that the AG has to approve on is the statutory authority." Cyrus Luhr chimed in and stated, "If the concern is conflicts with current GCA statutes, we can essentially. Our aim is to change GCA statutes itself when we adopt the Rules & Regs." Attorney Finney responded, "Right, but that won't be, like it won't get to the legislature without, well from this step–the next step is the Governor's approval as to policy and the next step after that is AG approval. We thought about skipping Triple A. If that were the case, then all of this you don't need any approvals."

- *Guam Water Quality Standards Triennial Review – Update*

Margaret Aguilar: Mrs. Aguilar provided a brief update on the Water Quality Standards including the Triennial Review Process, which is mandated by the Clean Water Act; and the two items that are a priority for us. Number one (1): USEPA has recommended a certain criteria that Guam EPA adopt in its water quality standards; and "if they aren't any, than we are not going to adopt we have to provide rational for doing that". Mrs. Aguilar stated that the Agency is adopting the criteria that they are recommending with the exception of maybe three (3) items – three (3) criteria which is: nickel; copper; and maybe aluminum. Because in the previous process for mixing zone, there was Guam's specific criteria would develop with a scientific report by the Navy and GWA. So we are going to submit those to USEPA to so take a look at it– whether or not that will meet the criteria for us not going with their recommended requirements. We are pretty close to identifying all those criteria and communicating that to USEPA and the 2nd set of revisions is our revisions that we want to make locally for the benefit of Guam.

Mrs. Aguilar further stated that some of the criteria for our water requires public involvement, so we held a meeting in January (2019) with seven (7) individuals participants (two of which were from the Agency), including representatives from the Navy, GWA, and senatorial staffers. Mrs. Aguilar re-stated that "we're pretty close to finishing our Triennial Review putting our list together of provisions that we want to focus on as far as a change in our Water Quality Standards so we'll turn in that report to USEPA as far as our Triennial Review and then in the Summer hopefully...we'll finish our draft of the proposed standards and then we'll public notice that and get

public comment again and then we'll have to come back to the Board and show our work for the presentation for approval." *Jesse Cruz* added, "Then, it goes through the whole Triple A process like *Kristan* was saying, it has to be adopted by the Guam Legislature. We are collaborating very closely with USEPA because otherwise working separately there might be a misunderstanding of what we're doing. It's best just to make sure that we understand the language that we are incorporating of course we are working very closely with *Kristan* on this also."

- *Walter S. Leon Guerrero - Appointment as Administrator, Guam EPA -*

Approval of the Appointment of Walter S. Leon Guerrero as Administrator: The Vice Chairman made a motion to approve the "re-appointment" of Walter S. Leon Guerrero as GEPA Administrator, and "asked" that "his pay be increased from \$70,873.00 to \$82,240.00", seconded by Director Sanchez. All voted in favor and the motion passed.

- *Air Force Re Stipulated Request for Continuance-NOV #2019-001 -*

Approval of the Andersen Air Force Base Stipulated Request for Continuance: The Vice Chairman made a motion to approve "to continue" the Air Force Stipulated Request for Continuance, seconded by Director Sanchez. All voted in favor and the motion passed.

At approximately 5:06 p.m. the Vice Chairman had to leave the meeting –leaving us with only the four (4) remaining board members.

VI. New Business:

- *CH2M/Jacobs Re PIEC -*

Mrs. Conchita Taitano stated that "For the Jacobs contract we are just focusing on the PIEC because there is a lot of moving parts a lot of projects going on –PIEC 23rd which is on a Sunday –23rd through 28th –ok so let's take a look at the schedule –this is our 30th Pacific Islands Environmental Conference (PIEC). The theme is "*Greening Growth in the Pacific*." Please make sure you register. There is supposed to be 300 slots...we are below 200 right now slots left, so it's filling up and we haven't even launched the advertisements" (*Mrs. Taitano* begins a website presentation of the 30th PIEC)

"So Saturday we put in there because we will start registration that evening –why –because on Sunday we have pre-conference workshops. We have the three (3) Solid Waste Association of North America (SWANA) certification workshops: one would be on composting; the other one is on Zero Waste; and the third one is on Integrated Solid Waste Management. These are three (3) day courses, so its not like when you –there is a fee and when you register –you'll register on this –there is a SWANA link and the fee will be there –we really got it at a reduced rate –what was it was it \$500? and Bob (the Chairman) you've attended many of those certification trainings and that normally with the ticket... We've started loading up Speakers –you'll know all about Risa Weinberger, P.E. Risa Weinberger & Assoc., Inc."

"Let's go back to Monday because you'll see the same courses –one thing that is included is a couple of things besides the SWANA certification classes. You'll see a Radon Measurement Courses Certification that's going to be conducted by Roland Gutierrez –Jesse (Cruz) has a by invitation only meeting for the Regional Environmental Laboratory Managers and Connie (Afleje) asked for an Environmental Grant Officers meeting so that again is by invitation only...so Coral Reef Symposium Workshop kicks off on a Tuesday the day before the official opening of the Conference and we really have some fabulous speakers...we also have environmental education –some of you folks remember Froilan Grate, Executive Director, GIAA Asia Pacific, for the Zero Waste Conference –so he's coming back and he'll be doing training on environmental education for teachers. We have a letter out to Jon Fernandez, Superintendent, GDOE letting him know that this is available that's number one; number two, we are also asking them if they could send students to attend if they would consider that as service learning hours...so I have that draft letter ready to go."

Mrs. Taitano and her team secured the attendance of *Mr. Ved Chirayath*, Director, Lab for Advanced Sensing, NASA. In addition to the Governor speaking on Wednesday, Mrs. Taitano listed a number of notable attendees, including the Honorable *John W. Henderson*, Assistant Secretary, Air Force for the Installations, Environment and Energy. She added, "By the way, when you register it will tell you to download Whoova which is an App into your phone and you'll get real time changes so if we have to change rooms it'll get right on to your phone and notify you."

Mrs. Taitano continued, "So, Thursday it will be the same except for the Coral Reef Symposium –Coral Reef is Tuesday and Wednesday thru Thursday. We'll be back to the 3 tracks –which is your Zero Waste Track just as it applies everything dealing with Recycling Waste conversion –you have the Green Infrastructure that's really everything dealing with Water; and then there is Innovation and Collaboration that's all on Partnerships."

Friday events will be half-day and filled with field trips, including but not limited to, the following: Food Waste Assessment field trip at the Hyatt Hotel; Mural Art Project (Artists from Hawaii), which we will partner with Bureau of Statistics & Planning office (BSP); and limited reserve slots to visit the Cocos Island Water System. The Administrator and *Conchita* said to anticipate some changes to the itinerary. Mrs. Taitano continued with the details of activities to include a closing dinner at the museum with a movie screening –it's a food waste film that was done by the late *Anthony Bordain*. Mrs. Taitano stated that the administrator has expressed an interest in having an awards ceremony as part of the welcoming event of up to 500 persons, but only allocated up to 300 persons. Guam EPA personnel encourage to participate.

Mrs. Taitano continued, "we do have merchandise, so that's another thing and I think this is going to work out great –we are doing some fund raising through the SWANA Pacific Basin Chapter. Our Chairman has been the lead for that with *Margaret* (Aguilar). *Margaret* has been helping out and I think we're funding for those items that cannot be paid by federal or local funds..." For example, the shirts and the welcome dinner event are prohibited expenses from the Federal funds or local funds. "This is what our fundraising is for" and the Chairman reported "over \$50,000 so far in sponsorship" with a final fundraising goal of \$80K to \$100K.

The Administrator asked details of the following: award ceremony; outreach mechanisms in Elementary, Middle School & High school on Anti-Litter and some of the monies raised by donation; and SWANA Chapter prizes for winners. The Administrator requested any "ideas" to incorporate with the festivities. (i.e. song, slogan or saying of Anti-Litter, etc.)

Mrs. Taitano continued, "you'll start seeing the advertisements roll out before the end of this month and I've met with our contractor and I know we're going to start seeing stuff on that media vision –you know that rolling marque." Focus will include speaker's interviews, advertisements, etc. Mrs. Taitano said, "we could talk later about some of the other projects that Jacobs is working...from Greening Roadways...Food Waste Assessment guidance document and...Bio-Solids...Waste Characterization study in conjunction with a partnership with BSP...I know they are also on task to help you with the bottle bill and taking a look at the plastic bag ban rule...Thank you very much!"

- *Walter S. Leon Guerrero - Appointment as Administrator, Guam EPA – (This was covered earlier.)*
- *Air Force Re Stipulated Request for Continuance–NOV #2019-001 – (This was covered earlier.)*

VII. Miscellaneous:

Chairman Perron: "Before we go into the Administrator's Report, I'd like to introduce *Mr. Larry Gast*. He is the new General Manager of GSWA and so like welcome to the island."

Mr. Gast: "I'm delighted to be here on Guam. I'll give you a bit of history about myself: I started out in solid waste in Kennedy Space Center in Cape Canaveral...I was hired originally as the entomologist for the Space Center and pesticides were one of the first things that they went into to make certifications; then, they went to solid waste;...asbestos abatement;...storm water; and I even got the licenses to paint the anti-tiling paint on the bottoms of the solid rocket booster recovery ships...so, that's what got me into the environmental field. I ended up retiring from the Space Center as the environmental manager. Then, I went to work at Orange County Florida for a landfill that was doing about Two Million tons a year. It was the largest municipally owned solid waste facility in the Southeastern United States. After that, I left and went to Putnam County and that's where I left from and came here. So I've been fifteen (15) years in the local government section and twenty (20) years in the federal government section."

Director Roth inquired about the status of the Memorandum of Understanding (MOU) with the Mayors and the use of Recycling Funds for cleaning efforts. The Administrator addressed the status of the “rollover” money and the pending paperwork and process. The Administrator clarified, “so we got most of the paperwork done. BBMR needed to approve of it; so, DOA can set up the account and once they set up the account then the Mayors office can start tapping into it. It’s pretty much out of our hands at this point...BBMR give the thumbs up...it’s a matter of DOA just sitting in the account (referring to the rollover money).”

Director Roth further inquired about the Public Notice on Underground Storage Tanks (USTs), which the Administrator confirmed it was completed. Attorney Finney provided details on what was coming up next month and explained that “the compiler of laws sent a letter this week to the Administrator regarding the UST rules and regulations and outlining why they still have to go through the process. It didn’t make it all the way through the Triple A process. So there are some things that have to be corrected...” The Administrator stated that the “statutes are still valid, the law is still there, and so it is still a requirement.” Some of the specifics and some of the upgraded regulations must complete the Triple A process.

Director Hollister asked Mr. Gast if Orange County, Florida residents “have a choice of whether or not the city collected their garbage?” Mr. Gast responded, “We had licensed zones that commercial entities did the collection but it was all a non-ad valorem assessment against the property owners and that was collected straight out of their taxes and everybody was mandatory garbage collection.” Mr. Gast continued, “that gets rid of illegal dumping; that gets rid of litter; that gets rid of everything and we had a requirement for commercial entities to either have a commercial contract or an account at the landfill so that they had something that they could get rid of if they did not have a commercial account and we notice that they weren’t using the landfill...In Orange County, we had seven (7) compliance officers, which were codes enforcement trained individuals that could write citations... they’d basically went out—commercial was picking up in neighborhoods too early in the morning and waking people up banging trash cans— they were written a citation. If people were mixing the wrong materials in the garbage, they got a citation and it was an easy thing cause it was in-house doing that but in Putnum County we didn’t do that...everything went in codes and enforcement and of course with codes enforcement – its not a high priority on their list.”

Mr. Glenn San Nicolas stated that, “with GSWA, they provide a 95 Gallon trash bin for trash and a 95 Gallon for Recyclables. If that is implemented...illegal dumping should go down dramatically and then the increase recycling measurement data should increase dramatically at the same time reducing a lot of that required enforcement for illegal dumping...three (3) to five (5) years ago, it was construction demolition debris—so we implement disposal plan on occupancy inspections that require them to submit disposal receipts that—so that went down but at the same time household waste –illegal dumping just went up dramatically.”

The Administrator provided information on illegal dumping by KUAM’s *Nestor Licanto*, which should air within days.

(A copy of reports that were issued is available with the Board Secretary upon appointment).

VIII. Next Meeting Date/Adjournment

The Chairman stated that the next regular board meeting date and time will be on Thursday, the 18th of April, 2019 at 4:00 pm. The meeting was adjourned at 5:28 p.m.


Vilma Bajajadia

GUAM ENVIRONMENTAL PROTECTION AGENCY

BOARD OF DIRECTORS MEETING

March 14, 2019

ADMINISTRATOR'S REPORT

I. FISCAL YEAR 2019 FINANCIAL REPORT (as of 03/12/2019)

GUAM EPA REVENUES:

A. Federal Grant Funds -	\$1,257,973.62
B. Special Funds (Budget Law Allotted) -	\$1,196,713.48

<u>TOTAL GUAM EPA REVENUES:</u>	\$2,454,687.10
--	-----------------------

GUAM EPA OPERATING EXPENSES & O/S ENCUMBRANCES (as of 03/12/2019):

C. Federal Grant Funds -	\$1,288,753.30
D. Special Funds (Budget Law) -	\$444,878.98

<u>TOTAL GUAM EPA EXPENDITURES & ENCUMBRANCES:</u>	\$1,733,632.28
---	-----------------------

GUAM EPA BALANCE/(DEFICIT):

E. Federal Grant Funds -	\$-30,779.68
F. Special Funds (Budget Law) -	\$751,834.50

<u>TOTAL GUAM EPA BALANCE/(DEFICIT):</u>	\$721,054.82
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TOTAL GUAM EPA FEDERAL GRANT REIMBURSEMENTS

Total Payment Requests for Reimbursement –	\$ 748,813.53
Pending Approval of Reimbursements -	\$ 0.00

GUAM ENVIRONMENTAL PROTECTION AGENCY

BOARD OF DIRECTORS MEETING

March 14, 2019

ADMINISTRATOR'S REPORT

II. RECYCLING REVOLVING FUND ACCOUNT (as of 03/12/2019)

REVENUES

Recycling Revolving Funds - \$ 2,895,965.00

GUAM EPA OPERATING EXPENSES & O/S ENCUMBRANCES FOR THE RECYCLING FUND (as of 03/12/2019):

A. Personnel -	\$22,770.50
B. Contractual -	\$0.00
C. Equipment, Materials, Supplies, Utilities, etc -	\$0.00
D. Travel -	\$0.00

TOTAL GUAM EPA EXPENDITURES & ENCUMBRANCES: \$0.00

TOTAL GUAM EPA BALANCE/(DEFICIT): \$2,873,194.50

**GUAM'S RECYCLING REVOLVING FUND
RULES AND REGULATIONS
Title 22, Division 4, Chapter 24, Article 3**

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GUAM'S RECYCLING REVOLVING FUND
RULES AND REGULATIONS
Title 22, Division 4, Chapter 24, Article 3

SECTION 24301. GENERAL PROVISIONS

§24301.1 Purpose and Applicability

The purpose of this Chapter is to clarify existing statute, provide a uniform competitive business environment to all, and establish the minimum standards to properly implement and administer Guam's Recycling Revolving Fund in accordance with Title 10 of the Guam Code Annotated (GCA), Chapter 51, Article 3, under the authority granted by 10 GCA §51307(c).

§24301.2 Definitions

For the purposes of this Chapter, the terms defined in 10 GCA, Chapter 51 Article 3, §51301 shall have the meaning ascribed to them therein, and the following words and phrases, together with all of the common derivations thereof, shall have the meaning ascribed to them as follows:

- (a) **"Beneficial Use"** shall mean the substitution of materials, either as generated or following additional processing, for some or all of the virgin materials in a natural or commercial product in a way that: provides a functional benefit; meets product specifications; and does not pose concerns to human health or the environment.
- (b) **"Best Available Technology"** shall mean a recognized and approved technology by United States Environmental Protection Agency.
- (c) **"Board"** shall mean the Board of Directors of the Guam Environmental Protection Agency.
- (d) **"Disaster Debris"** shall mean any items and materials broken, destroyed, or displaced by a natural or man-made federally or locally declared disaster. Examples of disaster debris include, but are not limited to, trees, construction and demolition material, and personal property.
- (e) **"Disaster Debris Management"** shall mean the removal and disposal of debris that was generated by a disaster and which presents an immediate threat to the public interest.

- (f) **"Electronic Waste" or "E-Waste"** shall mean electrical and electronic equipment that is dependent on electric currents or electromagnetic fields in order to function (including all components, subassemblies and consumables, which are part of the original equipment at the time of discarding). For example e-waste may include consumer/entertainment electronics such as televisions, DVD players and tuners; Devices of office, information and communications technology such as computers, circuit boards, telephones and mobile phones.
- (g) **"Import"** shall mean to bring in, or accept delivery of recyclable materials from any source outside of Guam.
- (h) **"Person" or "Persons"** shall mean any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, or any agency, department, or instrumentality of the Federal or local government, or any other legal representatives, agents or assigns.
- (i) **"Priority Materials"** shall mean all those materials identified by the Fund, in the order specified in section 24302.1(b) of this Article.
- (j) **"Recovered Resources"** shall mean material or solid waste that has been diverted from disposal for the purpose of recycling, composting or mulching. This term does not include incineration or those materials that are generated and normally reused on-site for manufacturing purposes.
- (k) **"Solid Waste Management Facility"** means any facility, or any machinery, equipment, vehicles, structures or any part of accessories thereof installed or acquired for the primary purpose of collection, transportation, storage, recycling, processing or disposal of solid waste, and shall include sanitary landfills or resource recovery facilities.
- (l) **"Stimulus Certification Form"** shall mean a form officially issued by Guam EPA to be completed by the Recycling Facility to disclose and certify the types and quantities of recyclable materials shipped off-island to a recycling facility.
- (m) **"Sustainable Materials Management"** means a systemic approach to using and reusing materials more productively over their entire lifecycles.
- (n) **"Special Waste"** means white goods, household hazardous waste, automotive batteries and abandoned vehicles.
- (o) **"Zero Waste"** means a holistic approach to addressing the problem of unsustainable resource flows. Zero Waste encompasses waste eliminated at the source through product design and producer responsibility, and waste reduction strategies further down the supply chain such as recycling, reuse and composting.

93 **SECTION 24302. ADMINISTRATION OF RECYCLING REVOLVING FUND**

94 (a) Monies in the *Fund* shall be administered, managed, and maintained by the GEPA
95 Administrator for the implementation of 10 GCA Chapter 51, Article 3, in accordance with the
96 requirements of the Article.

97
98 (b) The Administrator may use the *Fund* for the recycling initiatives described under §24303
99 in these Regulations with the following priorities:

100
101 First Priority: junk vehicles, tires, batteries, waste oil, white goods/appliances;

102 Second Priority: paper, cardboard, plastic and glass; and

103 Third Priority: other recyclables as determined by the Administrator
104

105 (c) The Administrator shall determine the funding for each of the recycling initiatives and submit
106 to the Guam EPA Board of Directors for approval by March 31st of the current fiscal year. The
107 approved funding will be effective on the following fiscal year.
108

109 **SECTION 24303. RECYCLING INITIATIVES**

110
111 §24303.1 Mayor's Council of Guam (MCOG) Island-wide Environmental Cleanup Program (IECP)

112 (a) The Administrator may approve contracts between the MCOG and recycling companies
113 for the collection, recycling, disposal and processing or any combination thereof, of
114 automobiles, buses, heavy equipment, trucks, batteries, tires, white goods, and other
115 recyclable materials in accordance with Articles 3 and 4 of Title 10 GCA, Chapter 51, and
116 24301.B to implement an IECP with the following conditions:

- 117 1. All applicable procurement laws must be followed;
- 118 2. Contracts must be conditioned upon proof of all valid permits, inclusive, but not
119 limited to solid waste facility permits, solid waste collection permits, certifications, or
120 other licenses required to collect, remove, recycle or dispose of solid waste and
121 compliance with all solid waste rules and regulations; and
- 122 3. Contracts must require the recycling company to report all recyclables collected by
123 village under this program to Guam EPA upon submittal of invoices to MCOG for
124 payment.

125 (b) Prior to any collection, processing or storage of recyclable materials under contract
126 pursuant to this section, a comprehensive *Operation Plan* for the current fiscal year must
127 be submitted by the MCOG for the contractual work described in §24303.1(a) to Guam

EPA for the implementation of the IECF and receive approval from the Administrator. The Administrator shall only approve the *Operation Plan* if it contains in detail the operational systems that address collection, processing, storage, emergency procedures, health and safety, reporting and closeout procedures for each municipality.

(c) The Administrator may use funds to support the recycling initiatives subject to the following conditions:

1. Funds may be expended only in accordance with valid contracts approved under this Section;
2. No funds shall be disbursed prior to the Administrator's approval of the Operation Plan described in §24303.1(b); and
3. Unused funds must be returned to the Recycling Revolving Fund every fiscal year.

§24303.2. Recycling Industry Economic Stimulus Program Applicability and Eligibility

(a) Potential Program Participants must establish eligibility by meeting all of the following criteria:

1. Recycling facilities must be licensed by the Department of Revenue and Taxation to conduct business on Guam
2. Possess a valid solid waste management facility permit for processing and storage issued by Guam EPA.
3. Provide a Bill of Lading or similar documentation detailing the types of recyclable materials, quantity in tons and name of receiving facility.
4. Completion and submittal of the Stimulus Certification Forms provided by Guam EPA.
5. Remain in compliance with all solid waste rules and regulations.

(b) This Program applies to recyclable materials solely generated on Guam. Recyclable materials imported into Guam for purposes such as, but not limited to, transit or consolidation shall not qualify under this Program.

§24303.3. Recycling Industry Economic Stimulus Program Payment Calculation

(a) Program participants which meet the eligibility requirements specified in Section 24303.2 may receive an economic stimulus payment for each ton of recyclable material transported off Guam to a recycling facility. Based on the availability of funds and funding priorities, some eligible submittals may receive no or partial stimulus payments.

(b) The Administrator may select the eligible recycling commodities which will be participating for the next Program term based on global market trends, and submit a

written recommendation to the Agency's Board of Directors for their approval by March 31st of the current fiscal year.

- (c) The Administrator may determine the dollar amount of the stimulus to be disbursed to the eligible recycling facilities based on §24303.3. (e).
- (d) A Program Payment Calculation may be evaluated annually by the Administrator, and may consider such factors as the prioritization of materials, market conditions, economic analyses, and operational, transportation, and processing costs in its assessment.
- (e) The stimulus payment per recyclable material shall be calculated as:
 - 1. Stimulus Payment [dollars per ton] = Shipping Cost - Market Price;
 - 2. Where a stimulus payment may be issued for recyclable materials when the calculated stimulus payment exceeds zero dollars (\$0.00) per ton (i.e., stimulus will not be paid when the recycled material is revenue positive); and
 - 3. Where a stimulus payment percent to be paid may be determined by the Administrator based on the availability of funds and funding priorities; and
 - 4. Where the shipping cost is calculated using the World Freight Rates Freight Calculator or comparable shipping cost resource for port-to-port containerized ocean shipments and the U.S. EPA Office of Resource Conservation and Recovery Volume-to-Weight Conversion Factors; and
 - 5. Where the market price is equivalent to the RecycleNet scrap index or comparable market index material sale price on the first day of the quarter preceding the start of the next Program term.
- (f) For the Program term beginning October 1, 2019, the Administrator may select the eligible materials and applicable stimulus payments.

§24303.4 Guam Beverage Container Recycling

- (a) Upon promulgation of the Rules and Regulations pursuant to 10 GCA Chapter 44, *Guam Beverage Container Recycling Act (GBCRA)* funds may be expended to initiate, assist and encourage redemption of recyclable beverage containers in the following activities:
 - 1. Funding of administrative, audit, redemption and compliance activities associated with collection and payment of the deposits of the GBCRA;
 - 2. Conducting of recycling outreach education, capacity building and demonstration projects; and
 - 3. Promotion and marketing of recycling-related activities.
- (b) Funds may only be expended under this section for the first two years following the date that rules and regulations promulgated pursuant to the GBCRA first become effective.

199 §24303.5 Integrated Solid Waste Management Plan

200 Applicability

201 Funds may be expended by the Administrator for any *best available technology* recognized
202 by USEPA, for programs to encourage recycling, composting and waste reduction
203 opportunities in support of the most current Integrated Solid Waste Management Plan,
204 adopted by the Guam EPA Board.

205

206 §24303.6 Green Waste Plan- Composting and Organics **RESERVE**

207 §24303.7 Disaster Debris Management

208 Applicability

209 (a) Funds may be used for activities that directly support, promotes, and encourages recycling and
210 removal of disaster debris, including citing of transition sites.

211 (b) All transition sites must be permitted by Guam EPA; and

212 (c) Only individuals, entities or companies licensed to do business on Guam are eligible to
213 receive funds.

214

215 §24303.8 Zero Waste Grant Program - **RESERVE**

216

217 §24303.9 Subsidize the Recycling/Tipping Fees for Low Income Households

218

219 The Administrator may use the funds to subsidize all residential households with priority to low
220 income households to encourage the use of trash collection and recycling services by Guam
221 Solid Waste Authority.

222

223

19-007
RECEIVED

MAR 13 2019

1:36 PM
Guam Environmental
Protection Agency

Guam Environmental Protection Agency Board of Directors
Building 17-3304 Mariner Avenue
Tiyan Barrigada, Guam 96913

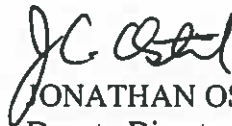
SUBJECT: Second Stipulated Request for Continuance re: Notice of Violation #2019-001

Honorable Members of the Board:

By a stipulated request for continuance dated February 15, 2019 (attached hereto for reference), Andersen Air Force Base, Guam ("we" or "our") requested that the Board of Directors (the "Board" or "you") postpone setting a hearing date for the above-referenced matter while the parties worked toward a resolution. The Board granted our request. However, we are still actively working to resolve this matter and respectfully request that the Board further postpone setting a hearing date until the May board meeting.

We thank you for your kind consideration. Our point of contact is 1st Lt James Hammons, whom you may reach by phone at (671) 366-2523 or by email at james.hammons.3@us.af.mil.

Sincerely,



JONATHAN OSTIL, GS-14, P.E., PMP
Deputy Director
36th Civil Engineer Squadron

So stipulated:



KRISTAN FINNEY
GEPA Legal Counsel



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 36TH WING (PACAF)
ANDERSEN AIR FORCE BASE GUAM

RECEIVED

FEB 18 2019

Guam Environmental
Protection Agency

February 15, 2019

Guam Environmental Protection Agency Board of Directors
Building 17-3304 Mariner Avenue
Tiyán, Barrigada, Guam 96913

SUBJECT: Stipulated Request for Continuance re: Notice of Violation #2019-001

Honorable Members of the Board:

Andersen Air Force Base, Guam ("AAFB," "we," or "our") is in receipt of Guam Environmental Protection Agency's ("GEPA") January 3, 2019 Notice of Violation #2019-001 ("NOV"). We recently met with GEPA, on Thursday, February 7, 2019, concerning the subject NOV.

GEPA informed us that its Board of Directors (the "Board") intends to set a hearing date regarding the NOV and our Notice of Intent to Appeal/Notice of Defense at the upcoming February board meeting. We respectfully request the Board postpone scheduling this matter, until the following March board meeting, as we continue discussion with GEPA to resolve this matter.

We thank you for your kind consideration. You may contact 1Lt James Hammons, should you have any questions and or concerns at 671-366-2523 or james.hammons.3@us.af.mil.

OSTIL.JONATHAN.
C.1187888596

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OSTIL.JONATHAN.C.1187888596
Date: 2019.02.15 11:26:15 +10'00'

JONATHAN C. OSTIL, GS-14, DoN
Deputy Director, 36th Civil Engineer Squadron

So stipulated:


KRISTAN FINNEY
Legal Counsel, GEPA



GUAM ENVIRONMENTAL PROTECTION AGENCY

AMERICAN PROTECTION LINE LA GUAMAN

EDDIE BAZA CAIYO
GOVERNOR OF GUAM


RAY TENORIO
LT GOVERNOR OF GUAM

17-3304 MAPINIP AVENUE TITAN, BARRIGADA GUAM 96913-1617

FIND US ONLINE AT HAGUAM.GOV

Lt. Col. Todd Inouye
Base Civil Engineer
Building 18001 Arc Light Blvd
Andersen Air Force Base
Yigo, GU 96929

DATE: JANUARY 03, 2018 ²²

NAME: Denmark Musngi
SIGN: 
DATE: 2 Jan 2019
TIME: 4:22 PM

Subject: Andersen Air Force Base Water System PWS ID. No. GU0000009
Chlorination of 0.5MG Water Reservoir at Northwest Field Water System
NOV#2019-001

Hafa Adai Lt. Col. Inouye,

I. BACKGROUND

The Andersen Air Force Base Water System has a permit to operate the Northwest Field Water System to supply domestic drinking water and fire suppression demand to Northwest Field facility. The System is an extension of the USAF water system, drawing water from USAF production wells AF-5 and AF-6, with a transmission, distribution, storage tank, and chlorination system. Guam EPA approved onsite generated liquid chlorine (MIOX system) for chlorinating the water system to conform to the Guam Safe Drinking Water Act.

On December 28, 2018, Mr. Angel Marquez and Ms. Juliana Mendoza of the Guam EPA Safe Drinking Water Program conducted a routine Sanitary Survey for compliance with the Agency's mandates under the Total Coliform and Ground Water Rules. During the survey, Guam EPA staff inspected the disinfection system located at the 0.5 Million Gallon Water Storage Tank at the Northwest Field service area. The approved disinfection method "onsite generated" known as MIOX went out of service at some time after the last sanitary survey, according to the operator, Mr. Zachary dela Cruz, Operator 36 CE/WFMS, but he was unable to specify exactly when this happened.

During the inspection, Mr. Angel Marquez and Ms. Juliana Mendoza of the Guam EPA Safe Drinking Water Program observed that a different form of disinfection had been installed utilizing a commercial pool sanitizer with the label "Pool Time Chlorination Tabs (3-in-1 Formula)", which according to the packaging contains Trichloro-S-Triazinetrione, CAS No. 87-90-1 (99% weight) and boric acid CAS No. 10043-35-3 (0.5-1%). According to Mr. dela Cruz and supported by the observations of the Guam EPA inspectors, this product was being used to disinfect the water supply at

TODO Y NILALAY TANO MAN UNO - ALL LIVING THINGS OF THE EARTH ARE ONE.



/GuamEPA



@guam_epa



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Lt. Col. Todd Inouye
Andersen Air Force Base Water System
NOV#2019-001

the water storage tanks. Mr. dela Cruz was not sure how long the US Air Force Water system has been using this chemical to treat water in the tank.

All Public Water Supply Systems (PWSS) are required to obtain a permit from Guam EPA prior to any changes in the water system pursuant to the Guam Primary Drinking Water Regulations, 22 GAR §6141.5(c). The operators of AAFB water system introduced a new treatment process (trichlor) in lieu of the approved system (MIOX) without first obtaining approval from Guam EPA.

Trichloro-S-Triazinetrione is also known as trichloroisocyanuric acid or trichlor for short. It is used as an ingredient in some products that are certified for use for drinking water treatment but the product "Pool Time Chlorination Tabs (3-in-1 Formula)" is an EPA registered pesticide sold for use as a sanitizer for pools and spas. Guam EPA does not allow the use of this sanitizer product for the disinfection of potable water, piping or storage tanks, even during the super chlorination prior to occupancy of the piping system and appurtenances.

When trichlor is dissolved in water, one of its dissociation products, cyanuric acid, is known to interfere with standard methods used to measure free chlorine residual, and as a result, actual chlorine residual is usually lower than indicated in operator's reports. The U.S. Environmental Protection Agency (USEPA) formally recognized this issue in an April 18, 2018, memorandum, which is attached for information and use in assessing the effects of the use of this product provided to the quality of water provided to users of the AAFB system.

Boric acid is used as an ingredient in many cleaning and personal hygiene products such as detergents, deodorants, and shampoos. It is also used as an insecticide in the control of cockroaches and termites. Its purpose as an active ingredient of the product "Pool Time Chlorination Tabs (3-in-1 Formula)" is not immediately clear to Guam EPA, however we are not aware of any approved use of boric acid as a drinking water treatment chemical, at any concentration or percent formulation.

II. VIOLATION

The Guam Safe Drinking Water Act prohibits *"Failure by a supplier of water to comply with regulations promulgated pursuant to §53105."* 10 GCA §53113(b).

The operators of AAFB water system introduced a new treatment process in lieu of the approved system (MIOX) without first obtaining approval from Guam EPA in violation of 22 GAR §6141.5(c).

III. COMPLIANCE ORDER

Andersen Air Force Base Water System is hereby ordered to:

- Cease and desist using "Pool Time Chlorination Tabs (3-in-1 Formula)" to treat

water at the 0.5 MG water storage tank located at Northwest field, Dededo, Guam.

- Apply to Guam EPA for a permit to utilize any disinfection system other than the original approved system. The application must include all relevant information identifying equipment and chemicals to be used for water treatment. All chemicals and equipment used must be approved for use in drinking water systems. The application must also include standard operating procedures (SOPs) detailing operation and maintenance of the proposed system.
- Discharge all water currently contained in the water storage tank and associated distribution piping, and flush and sanitize the tank and distribution system in order to remove any residue within 10 days of service of this notice.
- Conduct water testing for microbiological contamination upon completion of the preceding item and provide Guam EPA the laboratory results as soon as possible.
- Provide Guam EPA with a written report within 30 days of receipt of this NOV detailing the duration of the usage of Pool Time Chlorination Tabs (3-in-1 Formula (i.e., when it was first used and when its usage was stopped, and the total time that elapsed during that period) and an assessment of the impacts of this usage, to include but not be limited to: an assessment of probable average, minimum, and maximum chlorine residual concentrations during this time period, computed on the basis of the attached USEPA memo and associated online calculator; and a computation of the average and maximum concentrations of boric acid delivered to users of the AAFB system during this time.
- Issue a precautionary public notice as soon as possible to all users of water supplied by the USAF water system, utilizing the attached template. Any proposed modification of the language included in the attached template must be approved by Guam EPA.

IV. ADMINISTRATIVE PENALTY ORDER

Guam EPA hereby imposes an administrative penalty in the amount of One Thousand Seven Hundred (\$1,700.00) for each day of violation, pursuant to 10 GCA §53114(a).

V. NOTICE OF RIGHT TO APPEAL

You may file within ten days of the date of your receipt of this Notice of Violation/Order of Compliance, a Notice of Intent to Appeal also known as a Notice of Defense with the Guam EPA's Board of Directors, setting forth in such Notice of Intent to Appeal/Notice of Defense, a verified petition outlining the legal and factual bases for such an appeal. A copy of the Notice of Intent to Appeal/Notice of Defense is attached for your convenience.

Unless a written request for a hearing signed by or on behalf of the person, agency or business entity named above in this Notice of Violation/Order of

Lt. Col. Todd Inouye
Andersen Air Force Base Water System
NOV#2019-001

Compliance is hand delivered or mailed to Guam EPA within ten days after the Notice of Violation/Order of Compliance was personally served on you or mailed to you, Guam EPA may proceed upon the Notice of Violation/Order of Compliance without a hearing. A request for hearing may be made by delivering the enclosed form entitled "Notice of Intent to Appeal also known as a Notice of Defense", or by delivering a notice of defense as provided in 5 GCA §9205, to the following address:

Guam Environmental Protection Agency Board of Directors
c/o Administrator Guam Environmental Protection Agency
Building 17-3304 Mariner Avenue
Tiyan Barrigada, Guam 96913

If you file a Notice of Intent to Appeal/Notice of Defense, the Guam EPA's Board of Directors shall hold a public hearing, at which time you may appear and present evidence in person or through counsel in support of this petition.

Failure to file a Notice of Intent to Appeal and Verified Petition within the period specified above will constitute a waiver of your right to a hearing. If you waive your rights to a hearing the Notice of Violation and Order of Compliance will become final, and Guam EPA may proceed upon the Order without a hearing and without further notice to you.

Should you have questions please contact Guam EPA Chief Engineer CDR Brian Bearden, P.E., BCEE at 300-4779 or Julie Mendoza SDWP staff 300- 9026.

Sincerely,


WALTER S. LEON GUERRERO
Administrator

enclosures: Notice of Defense
Public Notification Template
Public Notification Certification
USEPA Dichlor/Trichlor Memo Dated April 18, 2018

cc: USEPA Region 9
Attorney General Office
Guam EPA Pesticides Program



GUAM ENVIRONMENTAL PROTECTION AGENCY

AMENSIAN PROTEKSION LINALA GUAMAN

EDDIE BAZA CALVO
GOVERNOR OF GUAM

RAY TENORIO
LT. GOVERNOR OF GUAM

ERIC M. PALACIOS
ADMINISTRATOR

YVETTE CRUZ
DEPUTY ADMINISTRATOR

P.O. BOX 22439 BARRIGADA, GU 96921

EPA.GUAM.GOV

Guam EPA Case# _____

NOTICE OF DEFENSE

I, _____, have received your Notice of Violations and/or Order of Compliance, dated _____, charging me for violations, and I wish to:

(Please check appropriate sections)

☐ A. Request for a hearing and

☐ 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.

☐ 2. Object to the form of accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.

☐ 3. Wish to prepare new matter in my defense.

☐ 4. Admit to the accusation in part.

☐ B. Admit the accusation in whole.

My mailing address is:

Signature:

Date:

DRINKING WATER WARNING

On [give date], we received notice that the water disinfection chemical in use by our water system is not approved by the Guam Environmental Protection Agency, for reason that the product, "Pool Time Chlorination Tabs (3-in-1 Formula)" is not certified or approved for use in potable water systems.

What should I do? What does this mean?

- **YOU DO NOT NEED TO TAKE ANY ACTION. THIS IS AN ADVISORY NOTICE ONLY.** The AAFB water system has removed all water treated with the subject disinfection product, and the water delivered to all system users is now considered safe. AAFB is working with Guam EPA to determine the exact exposure to this product that may have occurred.

"Pool Time Chlorination Tabs (3-in-1 Formula)" is composed of the following active ingredients: trichloro-s-triazinetriene, CAS No. 87-90-1 (99% weight) and boric acid CAS No. 10043-35-3 (0.5-1%).

Trichloro-s-triazinetriene is also known as trichloroisocyanuric acid or trichlor for short. It is used as an ingredient in some products that are approved and certified for use for drinking water treatment. It is very unlikely that use of this chemical resulted in any adverse health effects.

Boric acid is used as an ingredient in many cleaning and personal hygiene products such as detergents, deodorants, and shampoos. It is also used as an insecticide in the control of cockroaches and termites. Boron is also considered a possible trace mineral nutrient for humans, with an average daily dietary intake of about 1.5 mg for male adults. While exposure to large concentrations of boron can result in a number of severe health effects, it is very unlikely that any users of the AAFB water system were exposed to concentrations of boron large enough to produce any adverse health effects.

What is being done?

The AAFB water system has already removed all water treated with the unapproved disinfection product, and the water delivered to all water system users is considered safe. AAFB water system is working with Guam EPA to determine the exact exposure(s) to this product that may have occurred.

For more information, please contact [name of contact] at [phone number] or [mailing address].

Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

This notice is being sent to you by the Andersen Air Force Base Water System PWS ID No. GU0000009. Date distributed: _____.

Public Notice Certification

I _____ certify that the public notice(s) that I am submitting here before you have been posted , hand delivered, mailed, published in the newspaper, or submitted to the media (T.V. / Radio station). I also acknowledge that anybody who knowingly and willfully makes false statement, presentation, or certification in any application, records, report plan or other documentation filed or required to be maintained under the Guam Safe Drinking Water Regulations, or by any certification, or order issued under the Guam Safe Drinking Water Regulations, or who falsifies, tampers with or knowingly renders inaccurate information shall be subject to the penalties.

Notice distributed by _____ on _____.
(Method of Notification) (Date of Notification)

Public Notice Locations: _____.

Public Notice has required Elements;

- ☐ A description of the violation (MCL or FTM, etc..)
- ☐ When the violation or situation occurred (MCL or FTM, etc..)
- ☐ Potential adverse health effects, using the standard mandatory language(MCL)
- ☐ Population at risk (MCL)
- ☐ Whether alternative water supply is needed (MCL or FTM, etc..)
- ☐ Actions consumers should take to reduce their exposure to the contaminant (MCL)
- ☐ What are you doing to correct the violation or situation (MCL or FTM, etc..)
- ☐ When you expect to return to compliance (MCL or FTM, etc..)
- ☐ Name, business address, and phone number for additional information, and (MCL or FTM, etc..)
- ☐ Standard language encouraging distribution to all persons served. (Where applicable)

(Signature of PWS contact)

(PWS contact title)

(PWS Name)

(PWS I.D. Number)




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 18 2018

OFFICE OF WATER

MEMORANDUM

Subject: Compliance Determination for Inactivation Requirements of the National Primary Drinking Water Regulations when a Public Water Systems Uses Dichlor and Trichlor for Primary Disinfection

From: Anita M. Thompkins, Director
Drinking Water Protection Division 

To: Regional Water Division Directors
Regions I-X

This memorandum is being issued to assist the Safe Drinking Water Act (SDWA) primacy agencies in the implementation of the microbial inactivation/disinfection requirements of the National Primary Drinking Water Regulations (NPDWRs) and the use of Dichlor (Dichloroisocyanuric acid) or Trichlor (Trichloroisocyanuric acid) for primary disinfection to meet those requirements.

It should be noted that under the SDWA, EPA's Office of Ground Water and Drinking Water does not approve disinfectants for disinfection of drinking water. These uses are approved through the Office of Pesticide Programs under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA).¹ However, the NPDWRs establish requirements for inactivation/disinfection that public water systems must meet. EPA researchers have identified concerns regarding the measurement of free chlorine residual, measured in finished drinking water, using the NPDWRs-approved c DPD² and indophenol methods in the presence of the cyanuric acid found in Dichlor and Trichlor. Free chlorine residual measurement is necessary to apply the inactivation contact time tables found in the NPDWRs to determine the inactivation achieved in the treatment process for compliance with inactivation/disinfection requirements.

Based on the available literature, Dichlor and Trichlor, when dissolved in water, rapidly hydrolyze to release chlorine-containing species, where only a portion is free chlorine (i.e., hypochlorous acid and hypochlorite ion). The actual free chlorine percentage depends on several factors, including pH, temperature, chemical dosage and source (i.e., Dichlor or Trichlor), and the water's chlorine demand. The NPDWRs-approved DPD and indophenol methods cannot measure free chlorine residual in the presence of cyanuric acid when Dichlor or Trichlor are

¹ For more information on the intersect between SDWA and FIFRA, see <https://www.epa.gov/pesticide-registration/guidance-disinfectant-products-intended-treat-drinking-water>.

² DPD stands for N,N-diethyl-p-phenylene diamine. The method is generally referred to as DPD.

being used for primary disinfection. This has raised concerns that the inactivation determined based on chlorine residual measurements using the approved DPD and indophenol methods, in the presence of the cyanuric acid in Dichlor and Trichlor, may not be sufficient to meet inactivation requirements for the Surface Water Treatment Rules (SWTRs) or, if applicable, the Ground Water Rule (GWR) since free chlorine is not being measured.

The EPA has developed a web-based calculator to determine free chlorine residual in the presence of Dichlor and Trichlor at 25°C. That calculator is available at: <https://usepaord.shinyapps.io/cyanuric/>. EPA researchers intend to develop an enhanced web-based calculator that would determine free chlorine residual in the presence of Dichlor or Trichlor at a range of temperatures. Upon publication of the updated web-based calculator, EPA will conduct a webinar to train the states and public water systems on how to utilize the tool.

In the interim, the EPA recommends that primacy agencies review information from public water systems that have installed (or are considering installing) primary disinfection using Dichlor or Trichlor. Primacy agencies can conduct the review through their existing Public Water System Supervision Program oversight activities programs (e.g., sanitary surveys, plan review and treatment change approval process, required SWTR/GWR monitoring). The review should focus on SWTR and, if applicable, GWR inactivation requirements and should include:

- Determining the primary disinfectant(s) being used by the public water system,
- Identifying the location(s) for measurement of disinfectant residual(s) used in the calculation of inactivation achieved,
- Calculating inactivation routinely achieved compared to inactivation required, and;
- Requesting information about the analytical method being used for disinfection residual measurement.

This review will allow the primacy agency and the public water system to work together to identify and address vulnerabilities that might potentially compromise the public water system's ability to meet disinfection requirements. EPA will continue to work closely with the water sector community to identify new information regarding the use of Dichlor/Trichlor as a primary disinfectant and with primacy agencies reviewing public water systems' disinfection practices.

Should you have any questions or concerns regarding this memorandum, please contact me or Cathy Davis of the Protection Branch at Davis.CatherineM@epa.gov.

cc: Regional Drinking Water Program Managers
Regional Drinking Water Enforcement Program Managers
Alan Roherson, Association of State Drinking Water Administrators
Anita Pease, Acting Director, Antimicrobials Division, Office of Pesticide Programs, EPA

19-0454



GUAM ENVIRONMENTAL PROTECTION AGENCY

AMENSIAN PRUTERSON LINA'LA GUAHAN

EDDIE IBAZ CALVO
GOVERNOR OF GUAM

RAY TENORIO
1ST GOVERNOR OF GUAM

ERIC M. PALACIOS
ADMINISTRATOR

YVETTE CRUZ
DEPUTY ADMINISTRATOR

PO BOX 22139 HARRIGATA GU 96921

EPA.GUAM.GOV

Guam EPA Case# _____

Guam Environmental Protection Agency NOTICE OF DEFENSE

I, JONATHAN OSTIL, have received your Notice of Violations and/or Order of Compliance, dated January 03, 2018 [sic], charging me for violations, and I wish to:

(Please check appropriate sections)

☐ A. Request for a hearing and

☒ 1. Object to the accusation on the ground that it does not state acts or omissions upon which the Agency can proceed.

☒ 2. Object to the form of accusation on the ground that it is so indefinite or ambiguous that I cannot identify the infraction or prepare my defense.

☐ 3. Wish to prepare new matter in my defense.

☐ 4. Admit to the accusation in part.

☐ B. Admit the accusation in whole.

My mailing address is:

Building 18001 Arc Light Blvd
Andersen Air Force Base
Yigo, GU 96929

Signature:

jc. ostil

Date:

10 January 2019

19-0454



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 36TH WING (PACAF)
ANDERSEN AIR FORCE BASE GUAM**

RECEIVED

JAN 11 2019

Guam Environmental
Protection Agency

Guam Environmental Protection Agency Board of Directors
c/o Administrator Guam Environmental Protection Agency
Building 17-3304 Mariner Avenue
Tiyan Barrigada, Guam 96913

**SUBJECT: NOTICE OF VIOLATION #2019-001 RE ANDERSEN AIR FORCE BASE
WATER SYSTEM, PWS ID. NO. GU0000009**

Mr. Leon Guerrero:

Andersen Air Force Base, Guam ("AAFB," "we," or "our") has received¹ Guam Environmental Protection Agency's ("GEPA," "you," or "your") Notice of Violation #2019-001 ("NOV"). AAFB remains committed to maintaining compliant water system operations in accordance with applicable laws and regulations, and we are willing to cooperate with GEPA in resolving the above-referenced matter.

However, we are compelled to submit the attached Notice of Intent to Appeal/Notice of Defense on the following grounds. The NOV is so indefinite that AAFB cannot identify the infraction or prepare our defense. It charges, too generally, that the operator of the Northwest Field water system failed to comply "with regulations promulgated pursuant to §53105." NOV, Section II. Precisely which applicable regulation we have violated remains unclear.

Although the NOV more particularly charges that the operator of the Northwest Field water system has violated 22 GAR § 6141.5(c), that section is inapplicable here. Section 6141.5(c) deals with siting requirements and plan reviews, which occurs when a user newly constructs a public water system or decides to place a substantially altered water system into operation. It requires a user to obtain GEPA's approval before placing the new or altered public water system into operation. In this instance, AAFB never triggered Section 6141.5(c)'s approval requirement because we did not place a new or altered public water system into operation. Rather, we temporarily used a different method to disinfect groundwater drawn from wells AF-4 and AF-5.²

We respectfully assert that GEPA cannot proceed against AAFB without providing a definite and applicable basis for the NOV. Notwithstanding, we take this matter seriously and have, in good faith, taken immediate and meaningful steps to address your concerns, including ceasing the use of pool time chlorination tabs as a disinfection method, which had been used temporarily while the MIOX disinfection system was out of order; discharging and flushing the Northwest Field

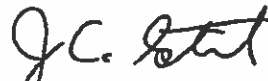
¹ NAVFAC Marianas operates the subject Northwest Field water system and has received a copy of NOV #2019-001, which you addressed to Lt. Col. Todd Inouye, Base Civil Engineer, Andersen Air Force Base.

² The NOV states that the Northwest Field system draws water from wells AF-5 and AF-6. See NOV, Section I ("The System is an extension of the USAF water system, drawing water from USAF production wells AF-5 and AF-6 . . ."). However, no well designated as AF-6 exists. The Northwest Field tank is fed by wells AF-4 and AF-5.

tank; conducting microbiological sampling; collecting data; and conducting thorough assessments. Currently, we have completed flushing and disinfecting the first tank and will start the same process to the other tank. We are also repairing our MIOX disinfection system with the intent to replace this system in the near future. We remain committed to working with you to resolve this matter promptly and in the right way.

If you have any questions, our point of contact is 1st Lt James Hammons, whom you may reach by phone at (671) 366-2556 or email at james.hammons.3@us.af.mil.

Sincerely,



JONATHAN OSTIL, GS-14, P.E., PMP
Deputy Director, 36th Civil Engineer Sq
Andersen AFB, Guam

Enclosures: (1) Notice of Intent to Appeal/Notice of Defense
(2) Verified Petition

"SAFETY FIRST"

BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED (OR EXPRESS COURIER)

Guam Environmental Protection Agency Board of Directors
c/o Administrator Guam Environmental Protection Agency
Building 17-3304 Mariner Avenue
Tiyan Barrigada, Guam 96913

RECEIVED

JAN 11 2019

Guam Environmental
Protection Agency

Re: Appeal of Notice of Violation #2019-001

Andersen Air Force Base, Guam ("AAFB") provides the following Verified Petition outlining the legal and factual basis for the attached appeal.

VERIFIED PETITION

The Petition of JONATHAN OSTIL respectfully shows:

1. AAFB operates wells AF-4 and AF-5 (the "Wells") under Well Operating Permit Numbers 0314-009P and 0314-010P at Andersen Air Force Base, Guam.
2. AAFB also operates the Northwest Field tank (the "Tank"), which draws water from the Wells. The Tank does not draw water from a well designated as AF-6.
3. Upon information and belief, no well designated as AF-6 exists.
4. Water drawn from the Wells is disinfected before it is fed into the Tank.
5. On December 28, 2018, Guam Environmental Protection Agency ("GEPA") conducted an inspection of the Northwest Field water system (the "Inspection").
6. Following the Inspection, GEPA issued Notice of Violation #2019-001 ("NOV") dated "January 03, 2018 [sic]."
7. The NOV generally charges that the operators of Northwest Field water system failed to comply "with regulations promulgated pursuant to §53105."
8. It more specifically charges that the operators of the Northwest Field water system violated 22 GAR § 6141.5(c).

9. GEPA cannot proceed against NAVFAC Marianas under 22 GAR § 6141.5(c) because it does not apply here.

10. Section 6141.5(c) requires a user to obtain GEPA's approval before placing a new or altered public water system into operation. Here, AAFB never placed a new or altered public water system into operation. A "public water system" by definition under 10 GCA § 53103(c) refers to system facilities, for example, storage tanks. Here, no system facilities were altered. Rather, a different method to disinfect groundwater pumped from the Wells was utilized. The utilization of a different disinfection method does not trigger Section 6141.5(c)'s approval requirements.

11. GEPA cannot proceed against AAFB under the general charge that the operators failed to comply "with the regulations promulgated pursuant to §53105" because it is too indefinite that AAFB cannot identify the infraction or prepare a defense.

Dated this 11 day of January, 2019

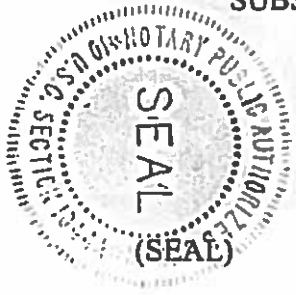

JONATHAN OSTIL

VERIFICATION

JONATHAN OSTIL, being first duly sworn on oath deposes and says: That he verifies the petition and, in so doing, states that he has read the same and knows the contents of it, and that the same is true of his own knowledge, except as to the matters which are stated in it on his information or belief, and as to those matters, he believes it to be true.


JONATHAN OSTIL

SUBSCRIBED AND SWORN to before me this 11 day of January, 2019.



A handwritten signature in black ink, appearing to read "Arterius Griffin", written over a horizontal line.

NOTARY PUBLIC

Arterius Griffin, TSgt, USAF

NOTARY PUBLIC
Authorized Under
10 U.S.C. Section 1044a

19-0700

RECEIVED

FEB 18 2019

Guam Environmental
Protection Agency



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS 36TH WING (PACAF)
ANDERSEN AIR FORCE BASE GUAM

February 15, 2019

Guam Environmental Protection Agency Board of Directors
Building 17-3304 Mariner Avenue
Tiyan, Barrigada, Guam 96913

SUBJECT: Stipulated Request for Continuance re: Notice of Violation #2019-001

Honorable Members of the Board:

Andersen Air Force Base, Guam ("AAFB," "we," or "our") is in receipt of Guam Environmental Protection Agency's ("GEPA") January 3, 2019 Notice of Violation #2019-001 ("NOV"). We recently met with GEPA, on Thursday, February 7, 2019, concerning the subject NOV.

GEPA informed us that its Board of Directors (the "Board") intends to set a hearing date regarding the NOV and our Notice of Intent to Appeal/Notice of Defense at the upcoming February board meeting. We respectfully request the Board postpone scheduling this matter, until the following March board meeting, as we continue discussion with GEPA to resolve this matter.

We thank you for your kind consideration. You may contact 1Lt James Hammons, should you have any questions and or concerns at 671-366-2523 or james.hammons.3@us.af.mil.

OSTIL.JONATHAN.
C.1187888596
Digitally signed by
OSTIL JONATHAN C.1187888596
Date: 2019.02.15 11:26:15 +10'00'
JONATHAN C. OSTIL, GS-14, DoN
Deputy Director, 36th Civil Engineer Squadron

So stipulated:

Kristan K Finney
KRISTAN FINNEY
Legal Counsel, GEPA

Post-it* Fax Note		Date	# of pages
To	1. BOARD	From	
Co./Dept.	2. SCAR/Kristan	Phone #	2/19/19
Phone #		Phone #	RENDER
Fax #		Fax #	KRISTAN